

July 10, 2002

**MEMORANDUM**

TO: Bill Rogers  
Title V Coordinator  
State Air Quality Division

FROM: Mandy Wright  
Engineering Intern  
State Office of Technical Services

SUBJECT: Riley Creek Lumber Co., Laclede, Idaho  
Administrative Amendments to Tier I Operating Permit No. 017-00027

**PURPOSE**

The purpose of this memorandum is to make administrative amendments to Tier I Operating Permit No. 017-00027, issued on May 3, 2002, in accordance with IDAPA 58.01.01.380-381. These amendments include correction of typographical errors and insertion of an omitted applicable requirement contained in an existing permit to construct (PTC) for the facility.

**SUMMARY OF EVENTS**

May 3, 2002	The Department of Environmental Quality (DEQ) issued Tier I Operating Permit No. 017-00027 to the Riley Creek Lumber Co. (Riley Creek) facility located in Laclede, Idaho.
June 6, 2002	Tom Harmon of the DEQ Coeur d'Alene Regional Office met with Riley Creek personnel to review and discuss the permit. The permit was reviewed in detail and several mistakes were found.
July 9, 2002	DEQ issued a letter to Riley Creek containing notification and a description of DEQ-initiated administrative amendments to be made to the Tier I operating permit.
July 10, 2002	Mandy Wright, DEQ Engineering Intern, made three administrative amendments to the permit. These amendments are discussed below.

**DISCUSSION**

**Amendment No. 1**

The permit issuance and expiration dates were omitted from the headers throughout the body of Tier I Operating Permit No. 017-00027. The permit was amended so that the issuance and expiration dates are now included throughout the body of the permit. This change to the Tier I operating permit is an administrative amendment in accordance with IDAPA 58.01.01.381.01(a).

### Amendment No. 2

The column headings of Tables 2.2 and 3.2 in Tier I Operating Permit No. 017-00027 contained a typographical error, which read "recording" instead of "reporting". The permit was amended to correct these errors. This change to the Tier I operating permit is an administrative amendment in accordance with IDAPA 58.01.01.381.01(a).

### Amendment No. 3

Tier I Operating Permit No. 017-00027 was issued without inclusion of an existing, applicable requirement contained in PTC No. 017-00027, dated June 26, 2001. This applicable requirement appeared as General Provision F in PTC No. 017-00027, and limits the maximum allowable operating rate of a source to 120% of the average operating rate attained during a DEQ-approved source test, unless (1) the test demonstrates noncompliance, (2) a more restrictive operating limit is specified elsewhere in the permit, or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in the permit.

Tier I Operating Permit No. 017-00027 contains steaming rate limits for the No. 1 and 2 boilers (Permit Conditions 2.5 and 3.5, respectively). The steaming rate limits originate from PTC No. 017-00027, and exist exclusively to limit the potential emissions rates of CO and particulate matter (PM) from the two boilers (refer to the technical memorandum for PTC No. 017-00027, dated June 15, 2001). These permit conditions, in both the PTC and the Tier I operating permit, also state that the allowable steaming rate can be modified by conducting a source test that demonstrates compliance with applicable standards (i.e., the CO and PM emission limits). The omitted permit condition (General Provision F in PTC No. 017-00027) defines the manner in which the steaming rate limit may be modified through source testing.

The omitted permit condition does not act to increase any emission rate limit, does not violate any existing permit condition, and does not represent an additional permit requirement. The omitted permit condition only serves to clarify existing Permit Conditions 2.5 and 3.5 of the Tier I operating permit. Therefore, the inclusion of this permit condition in Tier I Operating Permit No. 017-00027 is an administrative amendment in accordance with IDAPA 58.01.01.381.01(f).

The following text is a paraphrase of General Provision F in PTC No. 017-00027 and has been added to Permit Conditions 2.5 and 3.5 of Tier I Operating Permit No. 017-00027, dated May 3, 2002:

*In any case where the allowable steaming rate is modified by a source test(s), the maximum allowable steaming rate shall be limited to 120% of the average steaming rate attained during any performance test period, for which a test protocol has been granted prior approval by the Department, unless (1) the test demonstrates noncompliance, (2) a more restrictive steaming limit is specified elsewhere in this permit, or (3) at such an steaming rate, emissions would exceed any emission limit(s) set forth in this permit.*

## **CONCLUSION**

The administrative amendments discussed above were necessary to correct typographical errors and omissions, and to include an omitted applicable requirement in the Tier I operating permit. The omitted applicable requirement only serves to clarify Permit Conditions 2.5 and 3.5 of the Tier I operating permit. The amendments do not relax or violate any existing requirements, do not represent new requirements, and do not require any additional monitoring, recordkeeping, or reporting.

The administrative amendments are effective upon issuance of the amended Tier I Operating Permit No. 017-00027, dated May 3, 2002. In accordance with IDAPA 58.01.01.381, no public comment period is required to implement these amendments. Copies of the amended Tier I operating permit and this technical memorandum will be issued to Riley Creek and Region 10 of the Environmental Protection Agency in accordance with IDAPA 58.01.01.381.02(c).

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cc:      Joan Lechtenberg, Air Quality Division  
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